

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE:

Chapter: 13
Case No.: 17-31053

MOHAMMAD HOSSEINI

SSN: xxx-xx-8682

Debtor.

EX PARTE APPLICATION FOR AUTHORITY
TO RETAIN AND EMPLOY DAVID R. BADGER, P.A. AS SPECIAL COUNSEL
FOR THE DEBTOR *NUNC PRO TUNC*

Mohammad Hosseini, by and through undersigned counsel, moves this court for an Order employing David R. Badger of the firm of David R. Badger, P.A. as Special Counsel to the Debtor *nunc pro tunc*, and in support thereof says:

1. Mohammad Hosseini (hereinafter "Debtor") filed this Chapter 13 proceeding on June 25, 2017.
2. Debtor believes it would be in the best interest of the Debtor, the Chapter 13 estate and its creditors to employ David R. Badger of David R. Badger, P.A. as Special Counsel to the Debtor to assist in resolving a business matter related to Debtor's Chapter 13 case.
3. The normal hourly billing rate of David R. Badger is \$535.00 per hour. It is contemplated that David R. Badger will seek compensation based upon normal and usual hourly billing rates.
4. To the best of Debtor's knowledge, David R. Badger has no connection with the Debtor, creditors of the Debtor, or any other party in interest or their respective attorneys, the Chapter 13 Trustee or the Bankruptcy Administrator.
5. Debtor wishes to employ David R. Badger *nunc pro tunc* to July 24, 2017.

WHEREFORE, your applicant prays that David R. Badger be authorized to act as Special Counsel to the Debtor *nunc pro tunc*, with compensation for such legal services to be paid in such amounts as this court may hereafter determine and allow.

Dated: 8/14/17

/s/ 

Frederick Walter Hothke
Attorney for the Debtor
N.C. State Bar #
Saffa Law Group
10710 Sikes Place, Suite 180
Charlotte, North Carolina 28277
Telephone No.: (704) 246-8203

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**AFFIDAVIT OF DAVID R. BADGER IN SUPPORT OF APPLICATION TO RETAIN
AND EMPLOY DAVID R. BADGER, P.A. AS SPECIAL COUNSEL TO DEBTOR**

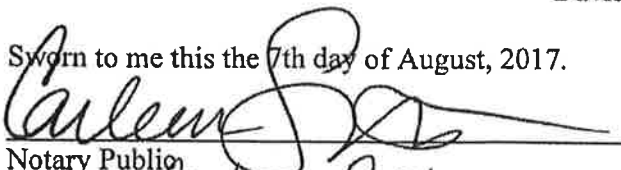
David R. Badger, being duly sworn, deposes and says:

1. I am an attorney with the firm David R. Badger, P.A. (the "Firm") located at 2108 South Boulevard, Suite 118, Atherton Lofts, Charlotte, North Carolina 28203 and have been duly admitted to practice law in the State of North Carolina.
2. Upon information and belief, insofar as I have been able to ascertain, I have no connection with the above-captioned Debtor, his creditors, or any other party in interest herein.
3. I am a "disinterested person" as the term is defined in Section 101(14) of the United States Bankruptcy Code, in that I am a) not a creditor, equity security holder or insider of the Debtor; and b) am not and was not an investment banker for any outstanding security of the Debtor.
4. David R. Badger and the Firm intend to apply for compensation for professional services rendered in connection with this Chapter 13 case, subject to approval of this Court and in compliance with applicable provisions of the Bankruptcy Code and Bankruptcy Rules, on an hourly basis, plus reimbursement of actual necessary expenses and other charges incurred by the Firm. My current standard hourly rate is \$535.00; however, said rate is subject to periodic adjustments.

WHEREFORE, affiant respectfully prays for the entry of an order authorizing the retention and employment of David R. Badger of David R. Badger, P.A. as Special Counsel to the Debtor and for such other and further relief as may be just and proper.


David R. Badger

Sworn to me this the 7th day of August, 2017.


Notary Public

Print Name: Carleen Smith

My Commission Expires: February 01, 2020

CARLEEN SMITH
Notary Public, North Carolina
Mecklenburg County
My Commission Expires
February 01, 2020